

**Kentucky Technical Advisory Committee on Therapy Services
June 19, 2014 Meeting Notes**

Advisory Committee Meeting 9:00 am-10:00 am

Members in Attendance: Dr. Beth Ennis

Members Attending via Conference Call: Teresa Justice, Leslie Sizemore, Sherry Hoza

Others in Attendance: Courtney Cundiff, Deborah Simpson, Helen Homberger, Tammy Ricks, Bob Hamilton, Jennifer Moore, Vaughn Payne, Debbie Moorhead and Catherann Terry

Conference Call Attendees: Fred Tolin, Mendy Pridemore, Pam Marshall, Scott Sageser, Kim

Purpose of Meeting: Purpose of the Therapy TAC; Progress re Recommendations to the Cabinet; Provider Enrollment; Therapy Assistant rate differential; Constituent Issues

Introductions

Minutes

January to May 2014 meeting minutes were considered and approved.

Discussion of Therapy Services Prior Authorization and Recertification Fee For Service:

Dr. Beth Ennis reported that Erin Hoben planned to respond to the question about therapy services 30 day recertification periods. The Committee members and participants discussed the impact of the abbreviated preauthorization to recertification interval, reporting that precertification is often delayed by 2-3 weeks after provider submission, with authorization delayed up to 1-2 weeks prior to submission of the required 30 day recertification. Members and participants indicated the abbreviated preauthorization to recertification interval doesn't allow the provider time to implement and evaluate the treatment plan for recertification. The Committee requests something in writing from the Cabinet about the timeline for pre- and recertification. The Committee stated the concern applies to fee for service members only.

Multiple Service Same Code Denials

Dr. Beth Ennis reported denials of authorization requests from therapy services providers using the same code for different services. One service request for the codes may be authorized but a request from another discipline will not eg. authorizing PT services request for 97530 but not OT services request for 97530. The Committee reports this concern applies to both fee for service and managed care, too.

Provider Information Needs

Dr. Ennis noted providers need a list of managed care representatives by region. She noted the Therapy association plan to develop FAQ sheets for Medicaid provider enrollment and troubleshooting. Teresa Justice reported MCO representatives are changed without update.

OT Exclusion

Leslie Sizemore and Dr. Beth Ennis discussed the status of recommendation to remove the OT Exclusion from the regulation. Ms. Sizemore reported the recommendation is in committee in process.

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EPSDT Constituent Issues

Jennifer Moore related that providers can participate to provide EPSDT SS as subcontracted providers or enroll in new provider types including group and individual provider types since expansion. Problems with new provider type enrollment were discussed.

No restriction has yet been placed on EPSDT Special Services enrollment. Members and participants discussed the benefits of enrolling as a EPSDT Special Services provider.

Leslie Sizemore noted that some MCOs require provider to be enrolled with Medicare prior to enrollment. Ms. Sizemore forwarded Anthem information about the requirement to the OT lobbyist. She reported another example of enrollment challenges: Passport required certification for certain therapy provider disciplines but not physical therapy when enrolling group providers and said the group doesn't meet facility requirements so can't enroll.

Scott Sageser asked if the Certificate of Need requirements for Certified Rehab agencies had been removed. Dr. Ennis stated the question had been posed to the MAC. The response has been to enroll in therapy discipline groups ie. PT group, OT group and SLP group. Ways to enroll multiple therapy services professionals under one owner were discussed. CON would be necessary and Medicaid enrollment would need to be permitted.

Pam Marshall asked about the benefit of fee for service or EPSDT Special Services reimbursement versus CORF. Dr. Beth Ennis responded that CORF and Certified Rehab involves third party payment for adults and children not eligible for Medicaid. Ms. Marshall noted increased reimbursement under EPSDT Special Services provider type enrollment for therapy services rates. Ms. Marshall asked questions about SCL II transition, MP Waiver services billing and multi-specialty group services billing: How is SCL II billing different for therapies for children under 21 years of age? Passport provided a contact, Courtney Cundiff, for Pam Marshall.

Rate Differential

Members recalled discussion about inconsistency in provider billing for the rate differential, ie. that hospital claims default to the reimbursement rate for the therapist in cases when assistants have performed the services. Scott Sageser reported learning in a meeting with the Commissioner that the differential will not change until the Cabinet knows whether funds will be available.

Other Issues

Leslie Sizemore reported seeing evidence of successful billing. This was affirmed by Dr. Ennis, acknowledging bumps experienced by other practitioners. Sherry Hoza will check with Linda Gregory about experiences with billing Speech Therapy codes. Scott Salyer indicated problems with billing 2014 codes had now been fixed. Pam Marshall conveyed concerns with prior authorization for the new codes and with the rates, ie. the speech therapy rate is very low and compared the new rates to the EPSDT Therapy Services rates. Dr. Ennis will forward Ms. Marshall's concern to Catherann Terry by email. Mr. Salyer reported the Commissioner stated there were no monies to address the rate concern. Dr. Beth Ennis noted cost savings can be considered for benefit of remaining EPSDT Special Services with Supported Community Living provider status. Teresa Justice will ask her agency billing office if Speech Therapy services are getting paid.

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Membership

Dr. Ennis not the TAC will need to get recommendations for 3 new members, 1 for PT, 1 for OT and 1 for SLP, with plans to rotate membership among the 3 organizations. Sherry Hoza will contact KSHA for a nominee. KPTA is working on a nomination and KOTA will work on one with Leslie Sizemore to bring to KOTA attention.

Next Meeting

The next meeting will be scheduled prior to the MAC at 8:30 am on July 24th.

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